

## BDCP RDEIR/SDEIS Review Document Comment Form

**Document:** Administrative Draft— Section 4

**Comment Source:** Mike Tucker NMFS

**Submittal Date:** April 22, 2015

No.	Page	Line #	Comment	ICF Response
1	6	table	2 <sup>nd</sup> row “Flows will not be more negative than an average of –2,000 cfs during D-1641 San Joaquin River pulse periods” should be replaced with: “no south Delta exports during the D-1641 San Joaquin River 2-week pulse”	
2	9	19-37	<p>See red-line/strikeout comments on Ch 3 – Proposed Action. Replace lines 19-37 with the following:</p> <p>To ensure that these objectives are met, diversions must be restricted at certain times of the year (more severely from December through June) when juvenile covered fish species are present. This is achieved by restricting the diversion to low level pumping when the juvenile fish begin their outmigration, which generally coincides with seasonal high flows triggered by fall/winter rains (called <i>pulse flows</i>); followed by providing adequate flows during the remainder of the outmigration (called <i>post-pulse operations</i>). The protections allowed during these pulses are intended to achieve safe juvenile passage past the intakes to well downstream of lower Delta channels that might otherwise lead them away from their primary migration route. Additional but less restrictive requirements apply for the late spring to late fall period. The north Delta diversion bypass flow criteria comprise three parameters that are applied to the Sacramento River: (1) low-level pumping; (2) initial pulse protection; and (3) three levels of post-pulse operations. These parameters are summarized below.</p> <p>The initial pulse of juvenile fish migration is a natural occurrence which is generally triggered by the first substantial runoff event of the season. This can occur as early as October or as late as February, but usually happens in</p>	

			December. During the initial pulse, flows will be diminished only by constant low-level pumping to the extent allowed under the rules described below. If the initial pulse occurs prior to Dec 1, then an assessment will be made to decide whether similar pumping restrictions are necessary to protect subsequent pulses. A flow condition will be categorized as an initial pulse based on real-time monitoring of juvenile fish movement. The definition of the initial pulse for the purposes of modeling is provided below.	
3	10	31	Ned to describe proposed operations in January	
4	11	15	Ned to describe proposed operations in January	
5	13	Table 4.1-3	"Environmental Commitment 6: Channel Margin Enhancement - Up to 4.6 levee miles". Mitigation ratios have not yet been determined but current common practice is a 3:1 ratio not 1:1.	
6	14	4	Mitigation ratios have not yet been determined but current common practice is a 3:1 ratio not 1:1.	
7	190	24	What is the meaning of this statement - "Alternative 4A would be implemented over a shorter period of time"? Is there any info in the document that backs this up and describes why the action would be implemented over a shorter period of time?	
8	232	39-41	<p>"Most juvenile Chinook salmon occur in the Delta from late fall through spring (November through May) although some fall- and spring-run smolts may encounter pile driving noise at the end of the outmigration season in June."</p> <p>Winter-run juveniles can show up in the construction area in October if there is an early flow pulse to trigger their migration.</p> <p>May need to add a measure that ceases pile driving during any October pulses that cause winter-run to show up at Knights Landing</p>	
9	236	Table 11-4A-11	Your estimates of median predation loss at NDD is equal to or greater than your entrainment reductions in south delta so how is this an improvement?	
10	236		"May through September winter-run spawning period" should be changed to "spawning and <i>incubation</i> period"	
11	246		You discount any modeled adverse effects due to reduced WUA for winter-run by saying their	

			population is low so they don't need the space, but then you highlight the modeled increase in WUA as an important benefit that outweighs increases in stranding risk. You can't have it both ways.	
12	247	6-7	<p>“Further, these results indicate that the November flow reductions in the Sacramento River identified above would not have a biological effect on winter-run Chinook salmon rearing.”</p> <p>Need to detail why you made this determination. It seems likely that these Nov flow reductions are a source of the modeled 63% increase in stranding risk for WR.</p>	
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